

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, September 08, 2010 2:38 PM
To: Kubeczko, Dave
Subject: FW: Resend (original sent 08-16-2010) of: EnCana Oil & Gas (USA), Orchard Unit 18-9HM Pad, NESW Sec 20 T8S R96W, Garfield County, Form 2A (#400083695) Review

Scan No 2033345 CORRESPONDENCE 2A#400083695

From: Pfister, Miracle [mailto:Miracle.Pfister@encana.com]
Sent: Wednesday, September 08, 2010 2:23 PM
To: Kubeczko, Dave
Subject: RE: Resend (original sent 08-16-2010) of: EnCana Oil & Gas (USA), Orchard Unit 18-9HM Pad, NESW Sec 20 T8S R96W, Garfield County, Form 2A (#400083695) Review

Dave,

Encana agrees with your changes for the distances and depth to groundwater below. We also agree with the COAs that will be required.

Please let me know if you need anything else.

Thanks,

Miracle Pfister

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Tuesday, September 07, 2010 12:16 PM
To: Pfister, Miracle
Subject: Resend (original sent 08-16-2010) of: EnCana Oil & Gas (USA), Orchard Unit 18-9HM Pad, NESW Sec 20 T8S R96W, Garfield County, Form 2A (#400083695) Review

Miracle,

Can you please review at your convenience. Thanks.

Dave

David A. Kubeczko, PG
Oil and Gas Location Assessment Specialist

Colorado Oil & Gas Conservation Commission
Northwest Area Office
707 Wapiti Court, Suite 204
Rifle, CO 81650
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dave.kubeczko@state.co.us



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From: Kubeczko, Dave
Sent: Monday, August 16, 2010 5:48 PM
To: Pfister, Miracle
Subject: EnCana Oil & Gas (USA), Orchard Unit 18-9HM Pad, NESW Sec 20 T8S R96W, Garfield County, Form 2A (#400083695) Review

Miracle,

I have been reviewing the Orchard Unit 18-9HM Pad **Form 2A** (#400083695). COGCC requests the following clarifications regarding the data EnCana has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 1517 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent (this includes ephemeral streams, irrigation ditches, drainages), as well as, perennial streams. COGCC's review indicates an intermittent stream located approximately 460 feet to the west. COGCC guidelines require designating all locations within close proximity to surface water a **sensitive area** (which EnCana has already indicated on the Form 2A). The following conditions of approval (COAs) will apply:
 - COA 4** - Location is in a sensitive area because of proximity to surface water (intermittent stream to the west); therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures (i.e., BMPs associated with stormwater management) sufficiently protective of the nearby surface water.
 - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids.
2. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 890 feet bgs for a well located 1540 feet away from the well pad. COGCC's review located a water well (Permit No. 27914-F-US DOE, other well) located 1534 feet to the southwest, with a total depth of 92 feet bgs and no other information; however, based on the well log, groundwater would most likely be between 60 and 90 feet bgs. COGCC believes this is probably indicative of groundwater conditions in this area. I can make the change if you send an email with this request.
3. **General:** Due to the potentially permeable nature of the surface materials in the area, the following conditions of approval (COAs) will apply:
 - COA 6** - All pits containing fluids (if constructed; reserve pit, production pit, frac pit) must be lined.
 - COA 38** - The moisture content of any drill cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts. At the time of closure, the drill cuttings must also meet the applicable standards of table 910-1.
 - COA 39** - No portion of any pit that will be used to hold liquids shall be constructed on fill material, unless the pit and fill slope are designed and certified by a professional engineer, subject to review and approval by the director prior to construction of the pit. The construction and lining of the pit shall be supervised by a professional engineer or their agent. The entire base of the pit must be in cut.

COGCC would appreciate your concurrence with attaching these COAs (items 1 and 3) to the Form 2A permit prior to passing the OGLA review. The other issue (item 2) also needs to be addressed prior to permit approval. If you have any questions, please do not hesitate to call me at (970) 309-2514 (cell), or email. Thanks.

Dave

David A. Kubeczko, PG
Oil and Gas Location Assessment Specialist

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